

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)**

**UNITED STATES OF AMERICA
v.
WALTER BARNES,
Defendant**

CASE NO. 8:25-cr-00141-PX

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**UNOPPOSED MOTION FOR TEMPORARY RETURN OF
PASSPORT AND TO TRAVEL**

Walter Barnes, through undersigned counsel, seeks the temporary return of his passport so that he may participate in his family's upcoming vacation. Undersigned counsel has consulted with counsel for the Government. The Government does not oppose this motion.

On May 12, 2025, Mr. Barnes, the founder and former president of a government contracting company, appeared before the Court and pled guilty to a one count Information, which charged him with participating in a conspiracy to bribe a public official and to commit securities fraud by failing to disclose that he had acceded to the public official's bribery demands. Mr. Barnes was released on his personal recognizance and without Pretrial Services supervision. A condition of his release, however, was that he surrender his passport and confine his travel to the continental United States. Mr. Barnes has complied with these conditions.

Mr. Barnes' family for the past several years has taken an annual vacation to Sint Maarten, on the Caribbean Island of St. Martin. This year, his wife, daughter, son, mother, sister, and nephew will be on the trip, which will occur from July 5th through 12th. Lodging and airfare have been prepaid. Mr. Barnes, of course, would like to be with his family.

Mr. Barnes requests that he be permitted to obtain his passport from the Clerk's Office on July 3, 2025, the last business day prior to his scheduled departure; be permitted to travel outside of the continental United States for this trip; and be required to surrender his passport back to the Clerk's Office on July 14, 2025, the first business day following his return.

As evidenced by the Court's release of Mr. Barnes on his personal recognizance without supervision and the Government's lack of opposition to this motion, Mr. Barnes—who has significant ties to the community, has known about the government's investigation for almost two years, and voluntarily appeared to enter his guilty plea—does not present any appreciable risk of flight. He will fully abide by his conditions of release as modified should the Court grant this unopposed motion and understands the consequences to him were he to fail to do so.

Dated: June 19, 2025

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I certify that on this 19th day of June, 2025, the foregoing unopposed motion for temporary return of passport and to travel was served on all parties through the Court's electronic filing system.

/s/ Barry J. Pollack
Barry J. Pollack